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March 15, 2022

VIA ECF

Honorable John P. Cronan
U.S. District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007-1312
212-805-0218

Re: Joint Status Letter in *Roc-A-Fella Records, Inc. v. Dash*, Case No. 1:21-cv-05411-JPC

Dear Judge John P. Cronan:

The parties submit this Joint Status Letter pursuant to the Court's September 30, 2021 Civil Case Management Plan and Scheduling Order (ECF No. 64).

The parties do not request a referral to the assigned Magistrate Judge for a settlement conference or to the Court-annexed mediation program.

At this time, Plaintiff Roc-A-Fella Records, Inc. ("RAF, Inc.") intends to file a post-discovery motion for summary judgment seeking entry of a permanent injunction preventing defendant Damon Dash from altering in any way, selling, assigning, pledging, encumbering, contracting with regard to, or in any way disposing of any property interest in the album *Reasonable Doubt*, including its copyright and including through any means, such as auctioning a non-fungible token (NFT) reflecting, referring, or directing such interest. Such motion would be based on, among other things, the Stipulation and Order entered by this Court on July 2, 2021 (ECF No. 27) and admissions that Mr. Dash has made during the course of the litigation as to his lack of ownership interest in *Reasonable Doubt*. The parties are in the process of meeting and conferring to determine whether they can reach an agreement that would obviate the need for RAF, Inc. to file the motion described above. And the parties are also in the process of meeting and conferring to determine whether they can reach a settlement agreement that would resolve this case. To this

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end, the parties respectfully request that the Court order that the parties file a subsequent Joint Status Letter on or before **April 1, 2022**.

I have been authorized to file this letter on behalf of Defendants Damon Dash and GoDigital Records, LLC.

Respectfully submitted,

/s/ Alex Spiro

Alex Spiro